To: Patulski, Meg[patulski.meg@epa.gov]; Berry, Laura[berry.laura@epa.gov]; Dubey,

Susmita[dubey.susmita@epa.gov]

Cc: Odendahl, Steve[Odendahl.Steve@epa.gov]; Denawa, Mai[Denawa.Mai@epa.gov]; Dresser,

Chris[Dresser.Chris@epa.gov]; Anderson, Carol[Anderson.Carol@epa.gov]; Schuller, Jennifer[Schuller.Jennifer@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Rickard,

Joshua[Rickard.Joshua@epa.gov]

From: Russ, Timothy

**Sent:** Fri 11/18/2016 3:05:06 PM

Subject: FW: Revised DRAFT Information for Transmittal to FHWA Regarding the I-70 East Project

Hi Everyone,

Based on our EPA-FHWA conference call of 11/17/16, I would suggest that the below issues/resolutions and information be provided in an email to FHWA and CDOT. Please note that revisions to the original email appear in red type.

# Ex. 5 - Deliberative Process

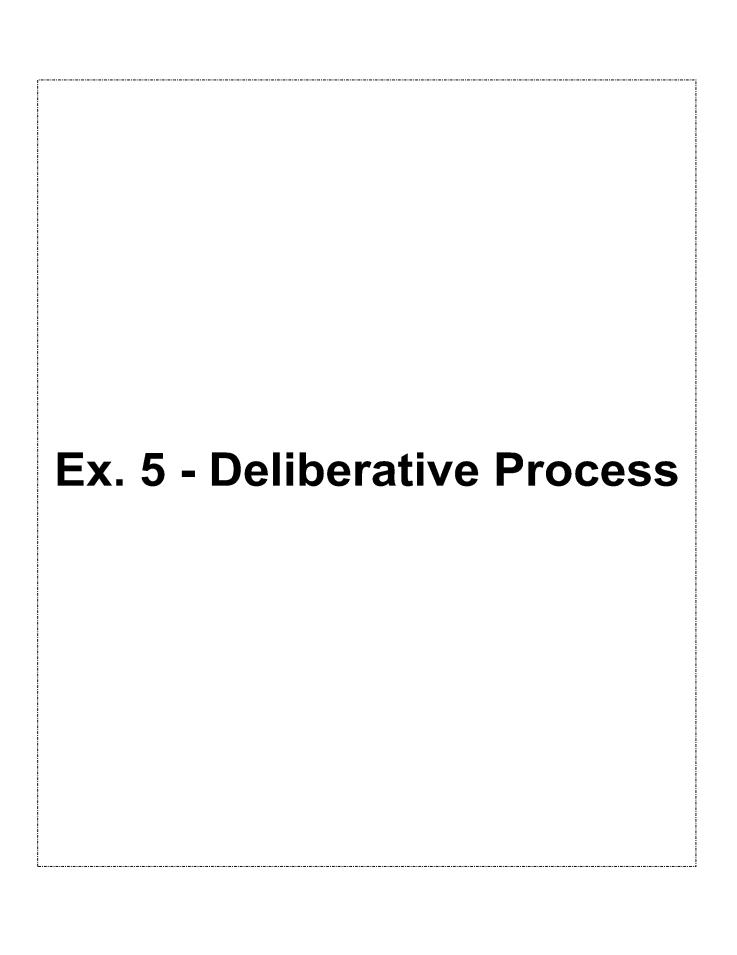
Thanks to all for your review and edits!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064

e-mail: russ.tim@epa.gov

SOURCE PRODUCT MANAGES MANAGES PRODUCT PRODUCT MANAGES MANAGES



# Ex. 5 - Deliberative Process

### La Casa (CASA)

Region: Denver Monitoring Station 4545 Navajo Street

SAROAD:

AQS ID: 080310026 Latitude: 39.779460 Longitude: -105.005124 Reporting capabilities (hourly) SLAMS: CO, PM10, PM2.5

NAMS: 03, S02

SPM: NO, RD, RS, TEMP, WD, WS

EPA's November, 2015 PM Hot-spot modeling guidance ("Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas") notes the following in section 9.3.4 *24-hour PM<sub>10</sub> NAAQS*:

### Calculating Design Values and Determining Conformity

The 24-hour PM<sub>10</sub> design value is calculated at each receptor by directly adding the sixth-highest modeled 24-hour concentrations (if using five years of meteorological data) to the appropriate monitor value for the 24-hour background concentration from three years of

monitoring data, based on Exhibit 9-6.153 Exhibit 9-6: Monitor Value Used for Design Value Calculation

Number of Background Concentration Values from Design Value Calculation the Monitor

**Monitor Value Used for** 

< 347 348 -695 696 -1042 1043 -1096

**Highest Monitor Value** Second Highest Value Third Highest Value Fourth Highest Value

PM<sub>10</sub> data from the La Casa monitoring site are provided in the table below:

### POC 1 1 in 3 Sampler

Year	Ν	Highest value	2 <sup>nd</sup> highest	3 <sup>rd</sup> highest	4 <sup>th</sup> highest
2015	119	55	48	44	43
2014	127	66	65	62	62
2013	122	81	73	56	45

<sup>&</sup>quot;N" = the number of days of valid data recovery.

**NOTE:** There are actually three PM<sub>10</sub> monitors co-located at the La Casa monitoring location. POC#1 is a "1 in 3" sampler and takes a sample every 3rd day; it is our understanding that this is the primary monitor as so designated by CDPHE. POC#2 is a "1 in 6" sampler and takes a sample every 6th day and POC#3 is a continuous monitor and samples every day.

# Ex. 5 - Deliberative Process

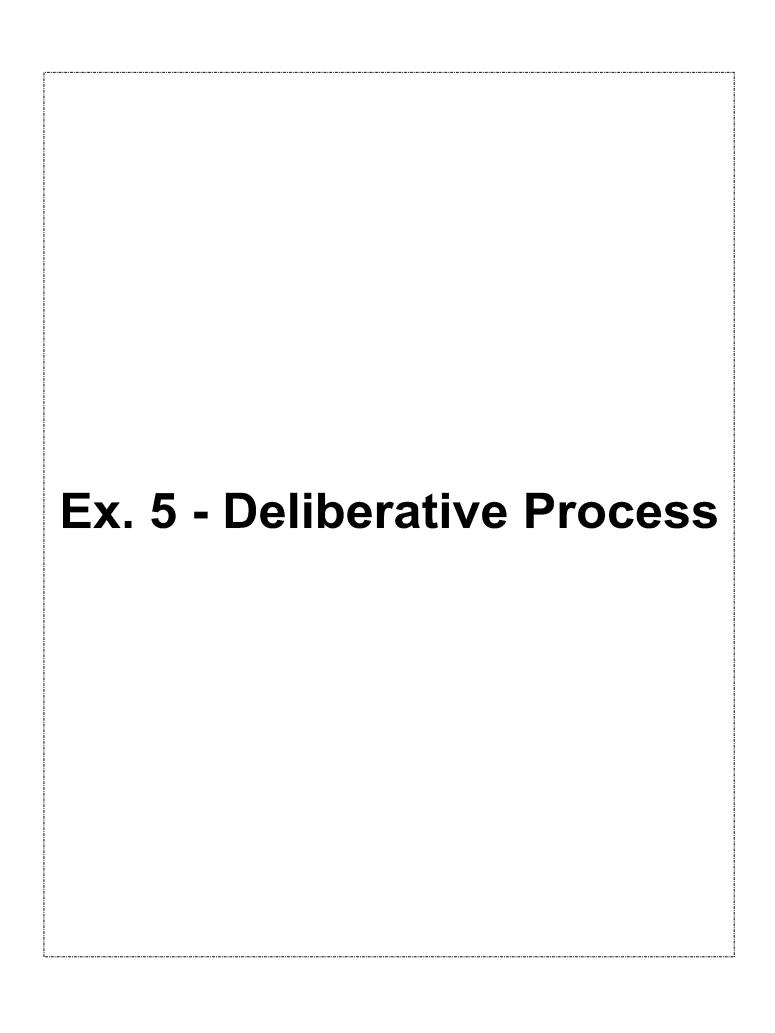
# Ex. 5 - Deliberative Process

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on 1-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

FHWA provided the below response:

"For the ROD modeling, FHWA ran MOVES2010b at the Project scale to develop lookup tables of PM<sub>10</sub> emissions rates for every possible combination of speed and grade. Separate tables of emissions rates were developed for "cars" and "trucks," as defined in the DRCOG model. To calculate total emissions for each link, these emissions rates (along with the APCD road dust emissions rates) are applied to the car and truck volumes on each link. Thus, rather than using one project-wide "truck fraction," truck emissions are explicitly calculated for each link using the reported truck volume for that link."

# Ex. 5 - Deliberative Process Ex. 5 - Deliberative Process



# Ex. 5 - Deliberative Process

Please let us know if there are any questions.

Thanks!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov